

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

J.D., on behalf of herself and others similarly situated, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	No. 17-cv-02122-TSC
)	
ALEX M. AZAR, <i>et al.</i> ,)	
)	
Defendants.)	
)	

JOINT STIPULATION FOR STAY OF PROCEEDINGS

The parties agree to a stay of proceedings of 105 days. Defendants are currently examining whether to issue a new policy regarding issue of parental notification, and respectfully request the Court to stay proceedings for 105 days until January 13, 2020 to complete this process. Plaintiffs have agreed to the stay request. The parties have further agreed to meet and confer on or around November 14, 2019, and December 20, 2019, to discuss the anticipated date of completion of Defendants' policy-making. Additionally, Defendants have agreed to provide Plaintiffs with any revised policy concurrent with dissemination of the policy to the public. Within five days after Defendants provide Plaintiffs with the revised policy, the parties will meet and confer, and provide this Court with a proposal as to how motion practice should proceed, including whether Plaintiffs will need to supplement or amend their pending motion for a preliminary injunction [ECF No. 144]. The parties also request that the Court hold in abeyance the deadlines for their status reports that are currently due on October 13, 2019, and November 4, 2019.

Finally, Defendants agree to continue to abide by the portion of the Joint Stipulation stating that Defendants (along with their respective successors in office, officers, agents, servants,

employees, attorneys, and anyone acting in concert with them) will continue to act in accordance with paragraph 2 of this Court's April 16, 2018 Amended Class Certification and Preliminary Injunction Order, ECF No. 136, and will not enforce or implement the current or any revised parental or sponsor notification policy until 45 days after briefing is completed.

A proposed order is attached.

September 30, 2019

Respectfully submitted,

/s/ Christina P. Greer

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CERTIFICATE OF SERVICE

I hereby certify that on September 30, 2019, I electronically filed the foregoing document with the Clerk of the Court for the United States District Court for the District of Columbia by using the CM/ECF system. Counsel in the case are registered CM/ECF users and service will be accomplished by the CM/ECF system.

By: /s/ Christina P. Greer
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Civil Division

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_____)	

[PROPOSED] ORDER ON JOINT STIPULATION

Upon consideration of the parties' JOINT STIPULATION, and in recognition of Defendants' agreement to continue to abide by Section 2 of this Court's April 16, 2018 Amended Class Certification and Preliminary Injunction Order, ECF No. 136, and not to enforce the current or any revised policy referenced in the JOINT STIPULATION until 45 days after completion of the briefing of Plaintiffs' Motion for Preliminary Injunction, ECF No. 144, it is hereby

ORDERED that these proceedings will be stayed until January 13, 2020; and it is further

ORDERED that the parties will meet and confer on or about November 14, 2019, and December 20, 2019, to discuss the anticipated date of completion of Defendants' policy-making and that Defendants will provide Plaintiffs with any revised policy concurrent with dissemination of the policy to the public.

ORDERED that within five days after Plaintiffs receive the policy, the parties will meet and confer and provide this Court with a proposal as to how motions practice should proceed.

Dated: September __, 2019

Tanya S. Chutkan
United States District Judge